

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA GOEDINGHAUS,	§	
	§	
Plaintiffs,	§	Case No. 5:23-cv-00580-FB
	§	
v.	§	
	§	
TRAMMELL S. CROW, JR.; BENJAMIN TODD ELLER; RICHARD HUBBARD; MELISSA MILLER; SCOTT WOODS; MRUGESHKUMAR SHAH; MICHAEL CAIN; COE JURACEK; PHILIP ECOB; H.J. COLE; CODY MITCHELL; KURT KNEWITZ; RALPH ROGERS; ROBERT PRUITT; SCOTT BRUNSON; CASE GROVER; RICHARD BUTLER; MICHAEL HYNES, JR.; SHAWN MAYER; JADE MAYER; AARON BURLINGAME; and RCI HOSPITALITY HOLDINGS, INC.,	§	Judge: Hon. Fred Biery Date Action Filed: May 8, 2023 (transferred)
	§	
Defendants.	§	
	§	

**[PROPOSED] ORDER GRANTING TRAMMELL S. CROW'S EXPEDITED OPPOSED
MOTION TO COMPEL PLAINTIFFS' FULL COMPLIANCE WITH PREVIOUSLY
ORDERED REPRODUCTION AND DOCUMENT IDENTIFICATIONS [DKT. 325]
AND FOR FURTHER PRODUCTION OF DOCUMENTS**

THE COURT, having considered Trammell S. Crow's Federal Rule of Civil Procedure 37(a)(3)(B) motion for an order compelling Plaintiffs Julia Hubbard and Kayla Goedinghaus to fully comply with the Court's previous order (Order (Dkt. 325) at 4) (hereinafter "Motion"), hereby GRANTS the Motion and ORDERS as follows:

The Court finds that Plaintiffs have not timely complied with the Court's previous order regarding their document productions. Plaintiffs therefore are ORDERED, within 10 days of entry of this ruling, to fully comply with the Court's previous order that specifically commanded Plaintiffs to "reproduce all previously produced discovery in the format identified by Defendant's request and as described during the hearing" and "identify (by Bates number) the documents that are responsive to each request for production for this initial reproduction and any supplemental production(s)." (Order (Dkt. 325) at 4.)

Plaintiffs are further ORDERED, within 10 days of entry of this ruling, to produce documents in their possession, custody or control that were not previously produced and are responsive to requests for production served pursuant to Federal Rule of Civil Procedure 34, such as text messages, social media, and materials contained in links for Dropbox and other database links that were embedded in previously produced documents but that were not themselves produced.

Having granted Mr. Crow's motion to compel, the Court must award Mr. Crow the reasonable expenses, including attorney's fees, he incurred in bringing his motion, unless one of the exceptions in Rule 37(a)(5)(A)(i)-(iii) applies. The Court, having determined that no such exception applies, ORDERS plaintiffs Julia Hubbard, Kayla Goedinghaus and their counsel of record in this matter pay Mr. Crow, jointly and severally, expenses in the amount of \$_____.

Plaintiffs and their counsel shall comply with this ORDER within ten calendar days of the hereof.

Dated: _____

Magistrate Judge Elizabeth Chestney